

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: ALEXANDER E. JONES Debtor.	§ § § § § §	Case No. 22-33553 (Chapter 7)
--	----------------------------	--

**ALEXANDER E. JONES RESERVATION OF RIGHTS
OF OBJECTIONS TO (I) SECOND INTERIM FEE APPLICATION OF PORTER
HEDGES LLP (#1085); (II) SECOND INTERIM FEE APPLICATION OF JONES
MURRAY LLP (#1086); (III) FIRST INTERIM FEE APPLICATION OF N&N
FORENSICS, LLC (#1087); AND (IV) FIRST INTERIM FEE APPLICATION
OF HMP ADVISORY HOLDINGS, LLC D/B/A HARNEY PARTNERS (#1088)
TO THE PROFESSIONALS FINAL FEE APPLICATIONS**

Alexander E. Jones (“Jones”) individually and as a Debtor in his Chapter 7 case, files this RESERVATION OF RIGHTS to file and make Objections to (I) Second Interim Fee Application of Porter Hedges LLP (#1085); (II) Second Interim Fee Application of Jones Murray LLP (#1086); (III) First Interim Fee Application of N&N Forensics, LLC (#1087); and (IV) First Interim Fee Application of HMP Advisory Holdings, LLC d/b/a Harney Partners (#1088) (collectively the “Fee Parties”) at the time of any Final Fee Application seeking approval by final order of these fees. In support of its Reservation of Objection, Jones submits the following:

JURISDICTION & VENUE

1. On December 2, 2022 (the “Petition Date”), Alexander E. Jones (the “Debtor”) filed its voluntary petition for relief under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§ 101, et seq., and after the Conversion Date, the Jones Chapter 7 Case.
2. On December 13, 2022, the United States Trustee for Region 7 (Southern and Western Districts of Texas) (the “U.S. Trustee”) appointed the Official Committee of Unsecured Creditors in the Jones Chapter 11 Case pursuant to Bankruptcy Code section 1102(a)(1).

3. The Court has jurisdiction concerning this Objection pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b), et seq. Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

**RESERVATION OF ALL RIGHTS AND
OBJECTION & RELIEF REQUESTED**

4. Jones reserves all rights granted by the Bankruptcy Code and under federal and state law regarding the right to, and the grounds of, any objection to the compensation of the Fee Parties as professionals in a Title 11 case, until the Fee Parties timely and properly file their respective final professional fee applications seeking a final order for approval of all these (i) Attorneys or Professional fees and expenses, or (ii) any prior professional fees and expense applications; or (iii) any subsequent attorneys or professional fees and expense applications. Jones specifically preserves all rights to object in any manner and as to any aspect of the Fee Parties' applications, and all remedies available to Jones regarding the Fee Parties applications, including all appellate rights for all such Fee Parties applications and any orders, whether interim or final, regarding such Fee Parties applications or orders thereon.

WHEREFORE Jones respectfully requests that the Court reserve any final ruling of payment pursuant to the (i) Second Interim Fee Application of Porter Hedges LLP (#1085); (ii) Second Interim Fee Application of Jones Murray LLP (#1086); (iii) First Interim Fee Application of N&N Forensics, LLC (#1087); and (iv) First Interim Fee Application of HMP Advisory Holdings, LLC d/b/a Harney Partners (#1088), for the reasons set forth herein and based on arguments or evidence to be made or offered at any final hearing thereon, and for such other and further relief to which Alexander E. Jones may be justly entitled, both at law and in equity.

Dated: March 7, 2025

/s/ Shelby A. Jordan

SHELBY A. JORDAN

State Bar No. 11016700

S.D. No. 2195

ANTONIO ORTIZ

State Bar No. 24074839

S.D. No. 1127322

Jordan & Ortiz, P.C.

500 North Shoreline Blvd., Suite 804

Corpus Christi, TX 78401

Telephone: (361) 884-5678

Facsimile: (361) 888-5555

Email: sjordan@jhwclaw.com

aortiz@jhwclaw.com

Copy to: cmadden@jhwclaw.com

CO-COUNSEL FOR ALEX JONES and FSS

BEN C. BROOCKS

State Bar No. 03058800

Federal Bar No. 94507

WILLIAM A. BROOCKS

St. Bar No. 24107577

Federal Bar No. 3759653

BROOCKS LAW FIRM PLLC

248 Addie Roy Road, Suite B301

Austin, Texas 78746

Phone: (512) 201-2000

Fax: (512) 201-2032

Email: bbroocks@broockslawfirm.com

CO-COUNSEL FOR ALEX JONES

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was served upon all parties registered to receive notices via the Court's ECF noticing system on March 7, 2025 as well as the following parties.

/s/ Shelby A. Jordan

Shelby A. Jordan